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October 9, 2002

Gregory N. Connolly, D.M.D., M.P.H.
The Commonwealth of Massachusetts
Executive Office of Health and Human Services
Department of Public Health
250 Washington Street
Boston, MA 02108-4619

Dear Dr. Connolly:

Thank you for inviting us to the meeting in Boston on June 27, 2002 to discuss issues related to the Massachusetts tobacco reporting regulation and its potential further development. During the meeting, we address the 10 points you raised in your invitation letter dated June 10, 2002; however, there was additional information that you requested.

Concerning the determination of "smoke pH" and the required reporting under Massachusetts' cigarette testing regulations (105 Mass. Code section 660 *et seq.*), you will find as Attachment 1 the results of puff-by-puff analyses of "smoke pH" of six of our brand styles. This information was obtained from our annual reports to the State of Massachusetts and contains information for three consecutive years (1999 to 2001). As can be seen from the table, there is no significant difference or trend over time with any of the brand styles. We agree that actual exposure measurements of cigarette smoke constituents by smokers are the most meaningful; and, as you know, efforts are underway to develop such capability. As we discussed before, we believe that the determination of "smoke pH", using the methods we currently have available, does not provide any further useful information about the smoke of the different brand styles of cigarettes. In addition, Attachment 2 contains five presentations and several publications, authored by Philip Morris scientists, that are directly related to "smoke pH" and nicotine trapping efficiency, some of which have been previously presented to you and your consultants.

We also agreed to provide information regarding the testing of physico-chemical properties listed in Point 3 of your letter dated June 10, 2002. Attachment 3 contains this information. Philip Morris periodically measures, as part of our product characterization testing, the listed parameters on dimension, weight/density, filter, and paper, noting that tobacco density is calculated using tobacco weight, cigarette length, and filter length circumference.

Source: https://www.industrydocuments.ucsf.edu/docs/ggpj0001

In the meeting on June 27, we discussed the importance of requiring that all cigarette products sold in Massachusetts comply with the State's reporting regulation. Since the regulation was designed to cover all cigarette products sold in Massachusetts, we believe that the inclusion of all products in the nicotine delivery reporting requirements is crucial to ensure that consumers in Massachusetts have information on all products available to them.

We are also sending a separate letter concerning the meeting in Boston on Friday, June 28, 2002. If you have any additional questions related to these matters, we would certainly try to answer them.

In both cases, we look forward to continued dialogue and cooperation.

Sincerely,

Attachments (3)

Source: https://www.industrydocuments.ucsf.edu/docs/ggpj0001

bc: J. Nelson
U. Nyffeler
P. Desel (w/Attachments)
M. Pfeil
L. Carchman
R. Dempsey
H. Haussmann
G. Kobal
G. Patskan (w/Attachments)
K. Podraza (w/Attachments)
W. Reininghaus
H. Roethig
E. Sanders
R. Walk (w/Attachments)

Source: https://www.industrydocuments.ucsf.edu/docs/ggpj0001